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September 19, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop Code 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: CC Docket No. 95-116

Yesterday, September 18, Gary Fleming, Delbert Duncan, John Scarborough, and the undersigned representing SBC/Pacific Bell met with Carol Matey, John Askin, Steven Teplitz, and Claudia Pabo representing the Policy and Planing Division of the Common Carrier Bureau to discuss issues in the above referenced docket.

Specifically, the SBC/Pacific Bell representatives updated the Policy and Planing representative regarding the current status of deployment of number portability capability in the Houston, TX. MSA and the Los Angeles, CA. MSA as well as the schedule for intercompany testing and ready to port dates. The attached document served as the basis for the discussion.

Please include this letter and the attachments in the record of these proceedings in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached concerning this matter.

Respectfully submitted,

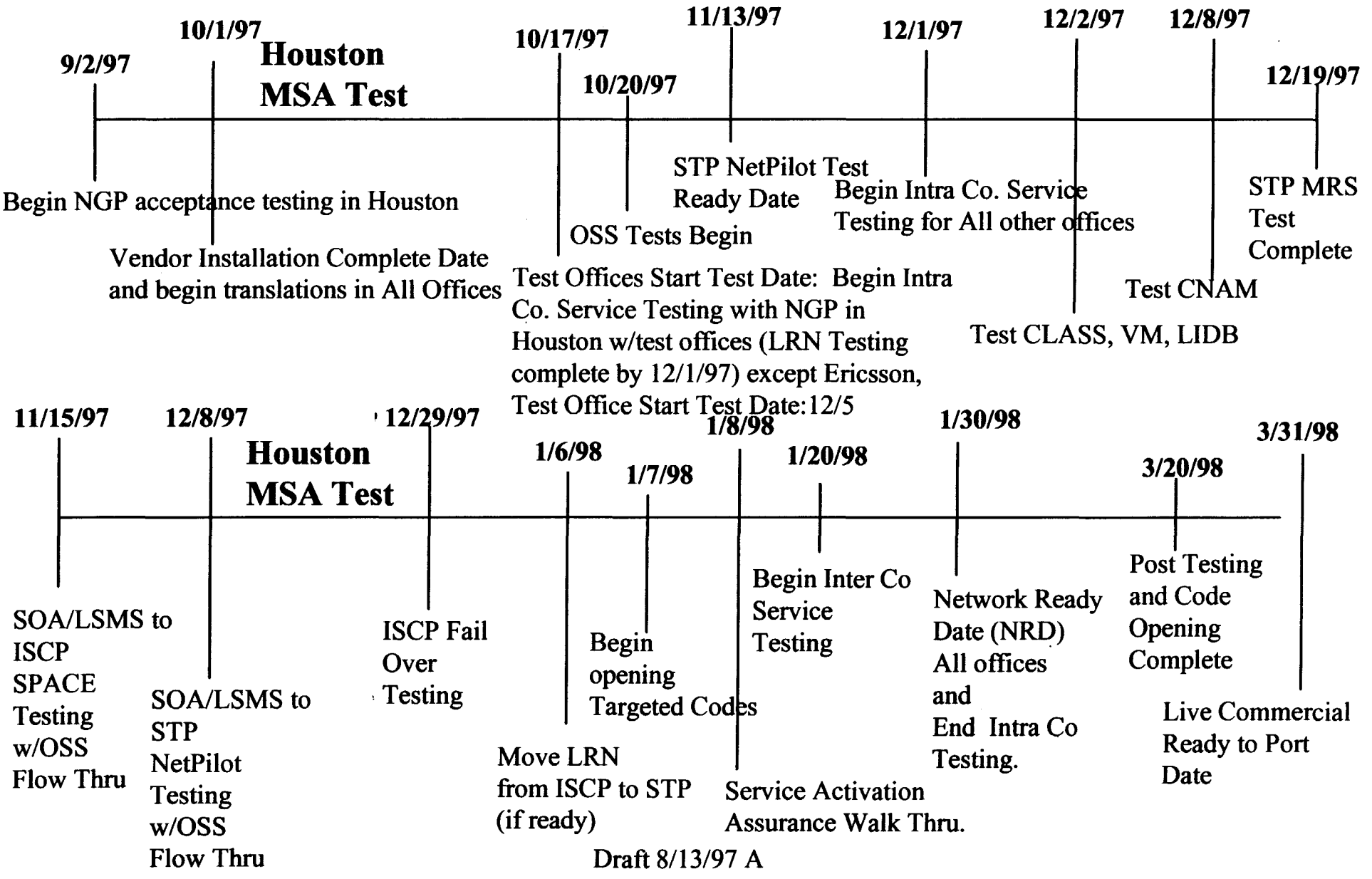
Link Brown

Attachments

cc: John Askin
Steven Teplitz
Carol Matey
Claudia Pabo

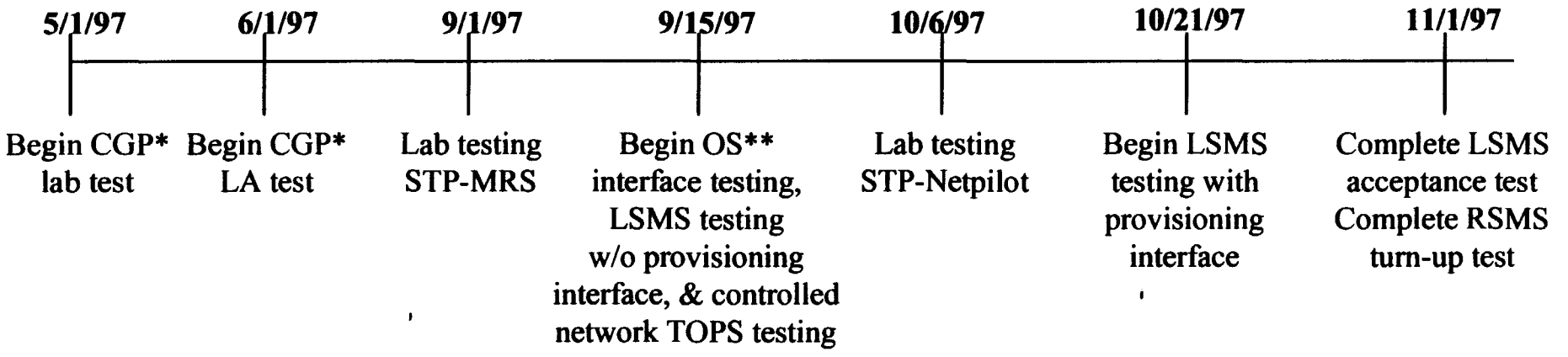
No. of Copies rec'd 0+2
List ABCDE

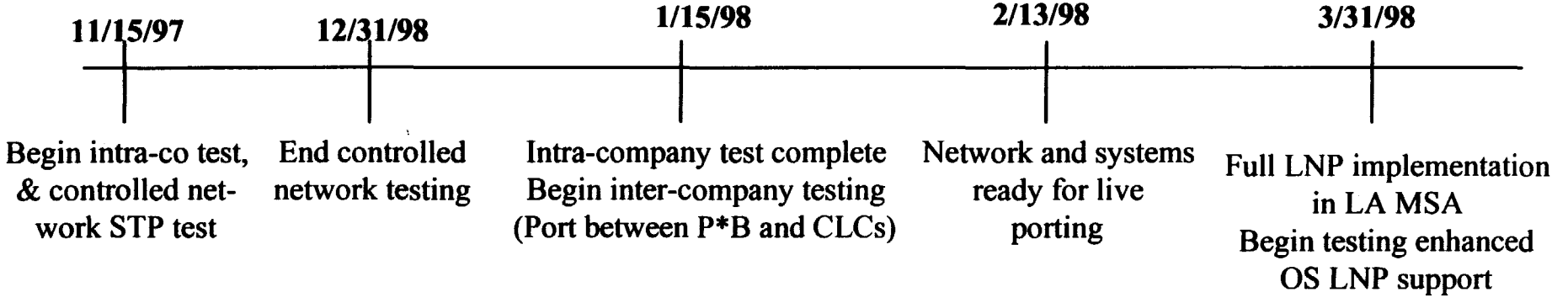
LNP Test Timeline 3/31/98



Draft 8/13/97 A

LA LNP Test Timeline



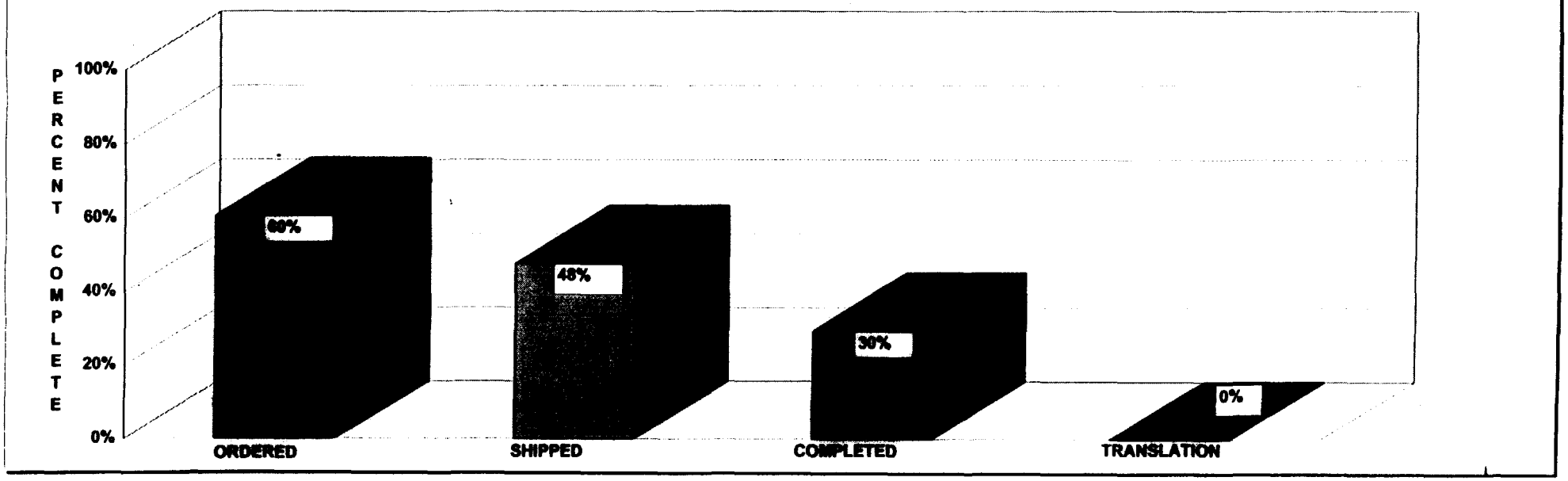


*CGP = Current Generation Platform STP

**OS = Ordering & Provisioning Systems

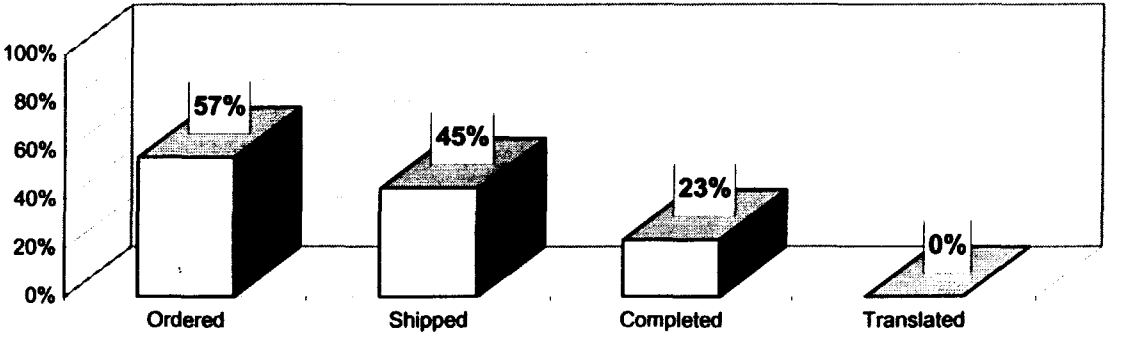
P*B LNP STATUS

	Ready To Port	Network Ready	Switch Type						Total per Phase	Jobs Ordered		Job Shipped		Vendor Complete		Translation Complete	
			DMS100	5ESS	1AESS	4ESS	DMS200/ AT	DMS200 AT/TOP		Num	Pct.	Num	Pct.	Num	Pct.	Num	Pct.
Phase 1																	
Los Angeles	31-Mar-98	1-Dec-97	44	28	17	4	1		94	94	100%	91	97%	74	79%		
Phase 2	15-May-98	15-Jan-98															
Riverside	15-May-98	15-Jan-98	6	4	2	1			13	13	100%	12	92%	5	38%		
San Diego	15-May-98	15-Jan-98	22	20	4		1		47	38	81%	34	72%	23	49%		
Phase 3																	
Orange County	30-Jun-98	13-Feb-98	13	21	6				40	34	85%	20	50%	13	33%		
San Francisco	30-Jun-98	13-Feb-98	24	8	5	1		1	39	19	49%	12	31%	1	3%		
Oakland	30-Jun-98	13-Feb-98	26	11	8	1		1	47	25	53%	18	38%	3	6%		
Phase 4																	
San Jose	30-Sep-98	15-Jun-98	4	18	4	1			27	7	26%	4	15%	1	4%		
Sacramento	30-Sep-98	15-Jun-98	7	18			1		26	7	27%	2	8%	0	0%		
Fresno	30-Sep-98	15-Jun-98	1	8				1	10	3	30%	1	10%	0	0%		
Phase 5																	
Ventura	31-Dec-98	14-Aug-98	7	1					8	1	13%	1	13%	1	13%		
Bakersfield	31-Dec-98	14-Aug-98	3	7				1	11	2	18%	0	0%	0	0%		
Stockton	31-Dec-98	14-Aug-98	3	5				1	9	1	11%	0	0%	0	0%		
Vallejo	31-Dec-98	14-Aug-98	6	2					8	1	13%	0	0%	0	0%		
Other																	
Chico	1999	1999		3					3	0	0%	0	0%	0	0%		
Merced	1999	1999		3					3	0	0%	0	0%	0	0%		
Modesto	1999	1999		5					5	0	0%	0	0%	0	0%		
Redding	1999	1999		5					5	0	0%	0	0%	0	0%		
Salinas	1999	1999		7					7	0	0%	0	0%	0	0%		
San Luis Obispo	1999	1999		3					3	1	33%	0	0%	0	0%		
Santa Cruz	1999	1999		5					5	2	40%	0	0%	0	0%		
Total P*B			166	182	46	8	3	5	410	248	60%	195	48%	121	30%	0	0%

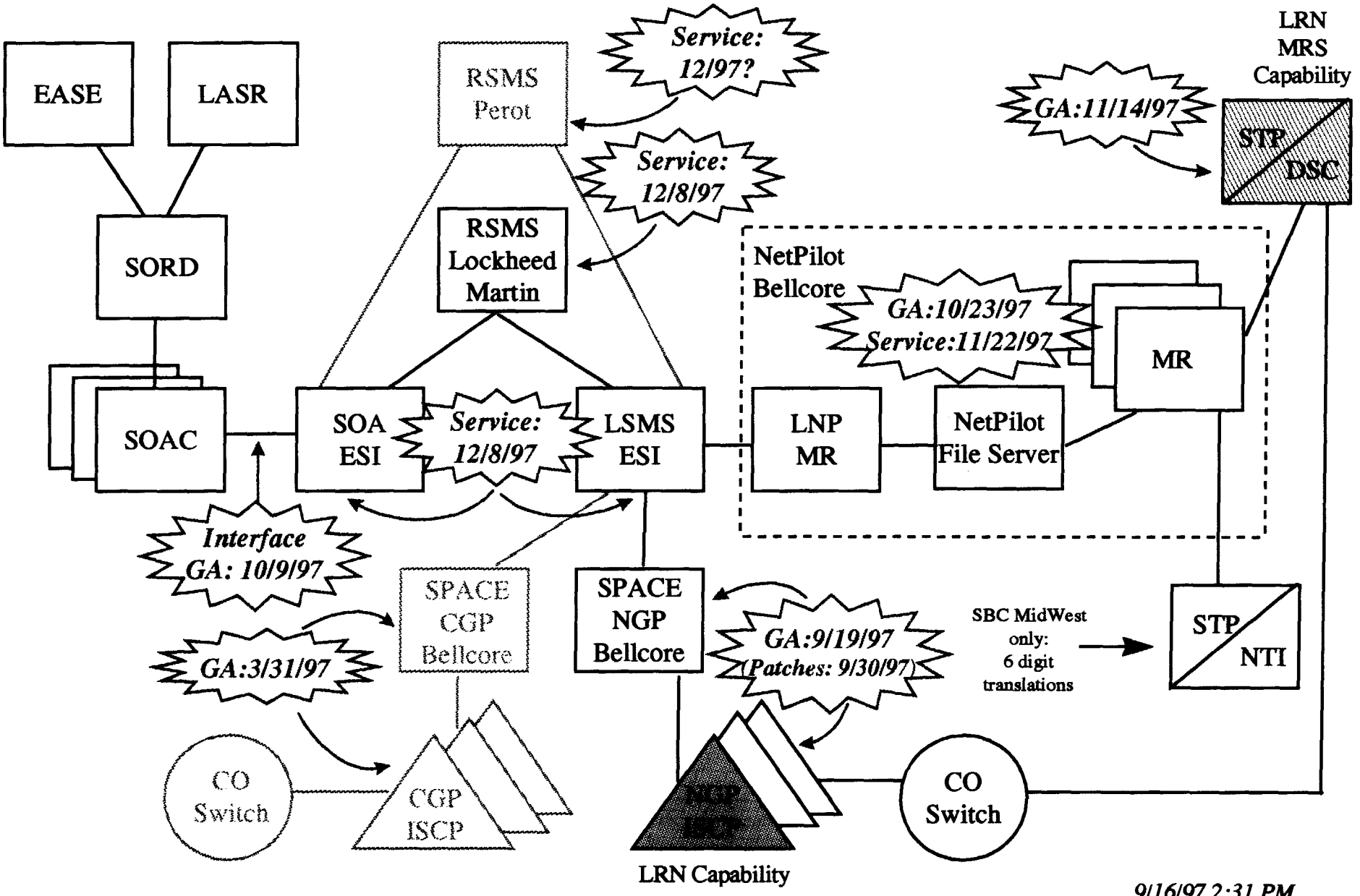


SWBT LNP Status

MSA	Ready to Port Date	Network Ready Date	Switch Type						Num of Sw in MSA	Jobs Ordered		Jobs Shipped		Vendor Complete		Trans Complete		Project Status
			1A	5E	D1	AXT	4E	D2		Num	%	Num	%	Num	%	Num	%	
Houston	3/31/98	12/1/97	35	17	7	3	0	4	66	66	100%	61	92%	47	71%	19	29%	
Dallas	5/15/98	1/15/98	13	26	6	2	1	1	49	49	100%	41	84%	13	27%			
St Louis	5/15/98	1/15/98	16	11	7	0	0	2	36	34	94%	21	58%	9	25%			
Fort Worth	6/30/98	2/13/98	13	9	10	0	0	2	34	28	82%	16	47%	4	12%			
Kansas City	6/30/98	2/13/98	8	17	7	0	0	4	36	8	22%	4	11%	0	0%			
Austin	9/30/98	6/15/98	3	8	7	3	0	2	23	3	13%	3	13%	2	9%			
Memphis	9/30/98	6/15/98	0	0	1	0	0	1	2	0	0%	0	0%	0	0%			
Oklahoma City	9/30/98	6/15/98	10	5	5	0	0	3	23	2	9%	0	0%	0	0%			
San Antonio	9/30/98	6/15/98	10	3	10	0	0	2	25	5	20%	5	20%	4	16%			
El Paso	12/31/98	8/14/98	3	4	3	0	0	0	10	0	0%	0	0%	0	0%			
Little Rock	12/31/98	8/14/98	0	7	4	0	0	1	12	0	0%	0	0%	0	0%			
Tulsa	12/31/98	8/14/98	1	1	6	1	0	2	11	0	0%	0	0%	0	0%			
Wichita	12/31/98	8/14/98	2	1	9	1	0	3	16	2	13%	2	13%	1	6%			
SWBT LNP			114	109	82	10	1	27	343	197	57%	153	45%	80	23%			



LNP PROVISIONING - FUNCTIONAL DIAGRAM



Pac Bell Components are shown in Yellow

9/16/97 2:31 PM

Supplier Issues

- Supplier Slippages
  - DSC: Message Relay Service feature and Netpilot interface delayed.
  - ESI: SOAC interface delayed.
  - Bellcore: ISCP Next Generation Platform delayed.
  - Nortel: DMS 100/200 XA Core processor delayed.
- Potential Problems
  - Bellcore ISCP/Nortel TOPS switch not compatible.
  - DSC STP lacks automatic code gapping feature.
  - Ericsson next generation processor delayed.
  - Perot NPAC/SMS commercial production system delayed.

Supplier Slippages

DSC: Generic Release 10

- Message Relay Service feature (CLASS and Calling Card Validation query routing) [June 30,1997 to August 29, 1997]
- Netpilot OSS interface [August 29, 1997 to October 6, 1997]

The Message Relay Service functionality is required for correct routing of TCAP messages for services such as CLASS and LIDB. The Netpilot Interface provides a link for provisioning LNP data required for Message Relay Service. The schedule changes for these elements have delayed testing the Message Relay Service functionality and its impact on existing services; and delayed the schedule for internal integrated testing. This will result in a compressed internal testing schedule and/or a delayed start for external inter-company testing.

Southwestern Bell Telephone has been able to absorb these delays without slippage of the "ready to port" date of March 31, 1998 through compression of the testing intervals. However, these delays have required Pacific Bell to slip their scheduled porting date by four weeks from January 15, 1998 to February 13, 1998. Any further delays in availability of these elements will be evaluated and may affect the scheduled porting dates.

Supplier Slippages

ESI: SOAC Interface

- Interface availability
  [Beta: July 1997 to Alpha: September 1997; GA: September 1997 to October 1997]
  (10/6 SWB, 10/6 PB - ESI wants 4 weeks of testing.)

The SOAC Interface is an integral part of the LNP ordering and provisioning process to the NPAC. The change in availability will delay our ability to test LNP in a fully integrated environment. This compresses our internal integration test timelines that must be completed before starting inter-company external testing. A compressed internal test schedule may not allow adequate testing or, if problems occur, may impact the inter-company test timelines. Any change to the external testing schedule could create problems for other suppliers and industry participants, may require additional funding to accommodate schedule changes, and increases the risk of not identifying problems before the FCC waiver deadline.

The SOAC Interface delay has also caused Pacific Bell to slip the scheduled porting date from January 15, 1998 to February 13, 1998, and compresses an already short timeframe to process orders for porting.

Supplier Slippages

Bellcore ISCP NGP Availability

- NGP Release 5.1
  [August 31,1997 GA to September 19, 1997 GA, additional patches September 30, 1997]

Due to SS7 conformance problems with the new front end processor in the NGP, the 5.1 software release has been slipped to September 19, 1997. There is the potential that additional patches will be required. These patches would be available September 30, 1997. If these patches are extensive, we will wait for the patches before loading 5.1. This produces an estimated 30 day slip in availability. Southwestern Bell is reviewing the timeline activities to determine how this slip can be absorbed.

Supplier Slippages

Nortel: XA Core Availability

- Next generation processor (XA Core)
  [August, 1998 GA to June, 1999 GA]

Southwestern Bell and Pacific Bell have several end office and tandem switches that will approach or reach processor exhaust when LNP is implemented. The original plan was to upgrade to the XA Core processor when it was available. SBC was promised at least one VO slot (available several months before the original GA date) to help with critical switches. The delay in XA Core availability has triggered significant changes to our network plans.

- An additional tandem switch will be installed in Houston on an expedited basis. The planning study for this additional tandem would have been done later this year with installation, if necessary, in the 1998/1999 timeframe.
- Until the new tandem is available (3Q98), traffic coming into the Houston 0801T switch will not have an LNP query performed, but will be default routed to the donor end office. This will impact call set up time and, in some instances, could impact transmission quality.
- End offices projected to exhaust due to LNP query processing will only perform LNP queries on their native NXXs. All other outgoing traffic will default route.
- Nortel has committed to a Capacity Enhancement Program to extend the life of the existing SN 70 processor. This program provides for real time processor efficiencies in the next three generic releases.
- If projected LNP related processor utilization estimates are exceeded, planned processor efficiencies are not achieved on schedule, or the XA Core availability is further delayed, additional switches may require query reduction and additional default routing will occur.

Other Potential Supplier Problems

Alliance (Bellcore) ISCP/Nortel TOPS

•TOPS VO Release LNP query format omits optional SS7 parameter. ISCP errors out query without this parameter.

Both Bellcore and Nortel were notified of this problem and requested to provide a fix. Nortel responded that a fix could not be provided until the NA010 release (December 1998). Bellcore has responded by providing a fix for this problem with new software. The NGP 5.1 Release will contain the corrected software. The fix for the CGP software has been sent in a patch and is currently being tested in Pacific Bell. This problem has delayed the start date for operator services testing in Southwestern Bell Telephone from August 1, 1997 to September 30, 1997 and reduces the time available for testing and problem resolution. Also, especially for Pacific Bell, requiring a software change on the CGP platform will create resource and schedule problems in the labs where additional soak and regression testing will be required.

Other Potential Supplier Problems

DSC

- Release 10 lacks Network Management Automatic Code Gapping (ACG) feature

DSC has developed an interim solution that will provides congestion reports and the capability for 10-digit manual intervention. The interim solution does not provide for automatic congestion controls. The interim solution is scheduled for FVO in January, 1998. Full ACG functionality is scheduled for Release 11 with FVO in March, 1998 and GA in June, 1998.

The major concern with the lack of adequate automatic network management controls is network reliability during a general or focused overload condition.

Other Potential Supplier Problems

Ericsson: Next generation processor (APZ 212-11 to APZ 212-20)

- Ericsson APZ 212-20 originally required for LNP on AXE 10 switches [October, 1997 to 1998]

Southwestern Bell Telephone has Ericsson switches throughout the network, including our first MSA implementation in Houston. LNP implementation included upgrading from the APZ 212-11 processor to the APZ 212-20 processor, based on information from Ericsson. Ericsson will now support the LNP software on their current processor, the APZ 212-11, in 4Q97. Due to delayed availability of the 212-20 processor, they have changed their direction from initial testing on the 212-20 to start testing on the 212-11. Ericsson is conducting processor studies on the largest Southwestern Bell Telephone switches using projected LNP query loads. Their initial study on our largest switch shows adequate processor capacity utilizing the current 212-11. Southwestern Bell will proceed with deploying LNP on the current processors, and processor upgrades will be handled as required under baseline growth.

If the 212-11 processors can handle the LNP query load (contrary to initial Ericsson projections), the delay in availability of the 212-20 processor will not affect our implementation. Should the 212-11 processor exhaust with LNP implementation, queries will be limited and traffic will be default routed.

Other Potential Supplier Problems

Perot: Number Portability Administration Center/Service Management System (NPAC/SMS)

- Delay expected on availability of commercial production system [October 1, 1997 to December, 1997]

The NPAC/SMS is a service provided by Perot which includes developing, maintaining, administering and operating a number portability administration center and service management system. The service centers around a regional database that receives, records, houses and distributes information on ported numbers so carriers can correctly route calls. Perot is the vendor of the NPAC/SMS for the South East, Western, and West Coast regions. Pacific Bell is a member of the West Coast portability region and must rely on Perot's service to provide LNP.

It has become apparent that Perot will be unable to meet the original master contract performance date for a 10/1/97 delivery of the commercial production system. Negotiations between Perot and the three regions that are served by Perot started on 9/10/97 and are scheduled to conclude by 9/19/97. Negotiations indicate that the delivery of the commercial production system will likely move to a December, 1997 date.

Initial assessments by Pacific Bell conclude that this change in delivery date can be managed within the current Pacific Bell schedules for LNP testing and service delivery. However, if additional delays are experienced, significant impacts to testing and production deliverables will occur.

Summary

- Implementation is on target to meet FCC schedule.
- Supplier slippages have occurred, but we have been able to deal with them by working with suppliers and compressing testing schedules.
- There is very little, if any, tolerance for further slippage.